

**PSJ14 Janssen Opp Exh 11 – Vorsanger Dep (dep not cited in  
appendices)**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

- - -

IN RE: NATIONAL : HON. DAN A.  
PRESCRIPTION OPIATE : POLSTER  
LITIGATION :  
:  
APPLIES TO ALL CASES : NO.  
: 1:17-MD-2804  
:

- HIGHLY CONFIDENTIAL -

SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

VOLUME II

- - -

December 6, 2018

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Continued videotaped deposition of  
GARY J. VORSANGER, Ph.D., M.D., taken  
pursuant to notice, was held at the law  
offices of Drinker Biddle & Reath, 105  
College Road East, Princeton, New Jersey,  
beginning at 9:20 a.m., on the above  
date, before Michelle L. Gray, a  
Registered Professional Reporter,  
Certified Shorthand Reporter, Certified  
Realtime Reporter, and Notary Public.

- - -

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<p>1 the plan.</p> <p>2 A. Right.</p> <p>3 Q. And if you'll turn to</p> <p>4 page -- unfortunately it doesn't have</p> <p>5 pages. But if you flip to, it looks like</p> <p>6 it's about seven pages from the end, and</p> <p>7 you'll see there's a slide that says,</p> <p>8 "Active surveillance."</p> <p>9 A. With the three bullets on</p> <p>10 it?</p> <p>11 Q. Yes.</p> <p>12 A. Okay.</p> <p>13 Q. Okay. The first of those is</p> <p>14 RADARS, correct?</p> <p>15 A. Yes.</p> <p>16 Q. And you said that that was a</p> <p>17 surveillance resource that the company</p> <p>18 incorporated into the plan when it became</p> <p>19 available from Denver Health; is that</p> <p>20 correct?</p> <p>21 A. That's correct.</p> <p>22 Q. And if you'll turn -- that</p> <p>23 was around what time, what year?</p> <p>24 A. Around 2006.</p>	<p>1 This lists the various</p> <p>2 elements of the RADARS system. Can you</p> <p>3 give a brief explanation of what those</p> <p>4 are?</p> <p>5 A. So the key informant network</p> <p>6 was a network I believe that was</p> <p>7 developed by Dr. Ted Cicero. And these</p> <p>8 were individuals who worked with people</p> <p>9 who abused products and they were gaining</p> <p>10 information about specific products in</p> <p>11 the form of a survey questionnaire. And</p> <p>12 those were -- those data were brought in</p> <p>13 and analyzed as part of one of the</p> <p>14 components of the RADARS system.</p> <p>15 The second one was a law</p> <p>16 enforcement network run by Dr. Inciardi.</p> <p>17 And I believe this was information</p> <p>18 collected from individuals working in law</p> <p>19 enforcement capacities from what they may</p> <p>20 have heard about drug seizures, heard</p> <p>21 other -- in areas where law enforcement</p> <p>22 became aware of different types of opioid</p> <p>23 analgesics and other medications that may</p> <p>24 have been gotten involved because of</p>
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<p>1 Q. And I think as we saw in the</p> <p>2 earlier slide deck, RADARS had been</p> <p>3 maintained earlier as a proprietary</p> <p>4 service that was operated by Purdue?</p> <p>5 A. Yes.</p> <p>6 Q. When you incorporated RADARS</p> <p>7 into the system, did you -- did you</p> <p>8 purchase the earlier data that RADARS had</p> <p>9 collected?</p> <p>10 A. Yes. When we started doing</p> <p>11 surveillance with RADARS for Duragesic I</p> <p>12 was interested in finding out what</p> <p>13 information, what was available, around</p> <p>14 the fentanyl products that were done</p> <p>15 prior to us starting our subscription.</p> <p>16 So we did have information that we did</p> <p>17 purchase from them.</p> <p>18 Q. And if you'll take a look at</p> <p>19 the next few slides. Well, let's start</p> <p>20 with the next slide actually. The one</p> <p>21 that says, "Active surveillance RADARS."</p> <p>22 A. Yes.</p> <p>23 Q. Let me make an attempt here</p> <p>24 to put it on the screen.</p>	<p>1 illegal-type activities.</p> <p>2 The AATOD, the American</p> <p>3 Association For Treatment of Opioid</p> <p>4 Dependence looked at individuals coming</p> <p>5 in, I believe, on methadone maintenance,</p> <p>6 and having an understanding of those</p> <p>7 types -- of that type of activity and</p> <p>8 what are the -- what are the medications</p> <p>9 that those individuals may have been</p> <p>10 using and abusing, and the poison control</p> <p>11 network was part of the U.S. poison</p> <p>12 control network.</p> <p>13 Q. All right. If you can turn</p> <p>14 to the next few slides.</p> <p>15 A. By the way, we have one more</p> <p>16 that was -- that may have been added</p> <p>17 later, which is the college survey.</p> <p>18 College survey.</p> <p>19 Q. Can you explain what that</p> <p>20 is?</p> <p>21 A. The college survey, I think,</p> <p>22 looked at the use of medications by</p> <p>23 college students, not for whom the drugs</p> <p>24 were prescribed. So for recreational</p>

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<p>1 professional. And work with groups like</p> <p>2 the NFL."</p> <p>3 That's the National Football</p> <p>4 League, correct?</p> <p>5 A. Yes.</p> <p>6 Q. -- "to destigmatize pain</p> <p>7 treatment and better understand abuse."</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. Do you know if there was a</p> <p>11 focus on athletes for pain management?</p> <p>12 A. I don't recall.</p> <p>13 Q. Who would know that?</p> <p>14 A. I don't know. I don't</p> <p>15 know -- I don't know if there are</p> <p>16 minutes, et cetera. I think -- I don't</p> <p>17 know.</p> <p>18 Q. Okay. Do you know if there</p> <p>19 was any work done with the NFL to</p> <p>20 destigmatize pain treatment?</p> <p>21 A. No, I think this was</p> <p>22 aspirational.</p> <p>23 Q. I don't know how I'm going</p> <p>24 to get you here. If you go to Page 37,</p>	<p>1 page it says, "Explored private and</p> <p>2 public funding sources." Do you have any</p> <p>3 recollection that that was done?</p> <p>4 A. I don't know. I don't have</p> <p>5 a recollection of whether that was done.</p> <p>6 Q. If you turn the page, and</p> <p>7 I'm looking for media outreach</p> <p>8 initiatives which is maybe two pages on.</p> <p>9 Reaching out to youth. Reach early,</p> <p>10 elementary school level, via respected</p> <p>11 channels, for example coaches. Deliver a</p> <p>12 practical message. Pain is your body</p> <p>13 telling you something important.</p> <p>14 Do you see that?</p> <p>15 A. On the next page, I'm sorry.</p> <p>16 Q. Do you see it?</p> <p>17 A. Yes.</p> <p>18 Q. Do you agree with that, that</p> <p>19 pain is your body telling you something</p> <p>20 important?</p> <p>21 A. Yes.</p> <p>22 Q. If you go a couple of more</p> <p>23 pages to where you see at the top, "Pain</p> <p>24 policy, advocacy sub-team platform," at</p>
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<p>1 and then there's a native -- okay, you</p> <p>2 found it. That logo. Turn the page, go</p> <p>3 to the next one. And it says Meeting</p> <p>4 Number 2, October 12th of 2011.</p> <p>5 A. Excuse me.</p> <p>6 Q. So this appears to be a</p> <p>7 second meeting of the group. Do you see</p> <p>8 that?</p> <p>9 A. Yes.</p> <p>10 Q. And is it your memory that</p> <p>11 there was more than one meeting of the</p> <p>12 group?</p> <p>13 A. I remember a second meeting</p> <p>14 which comes to mind now as I'm looking at</p> <p>15 it.</p> <p>16 Q. Okay. And it says, "Welcome</p> <p>17 new members and expanded communities."</p> <p>18 Do you see that, Bob, Scott, Pam and</p> <p>19 Phyllis?</p> <p>20 A. Yes.</p> <p>21 Q. Do you know who they are, do</p> <p>22 you remember?</p> <p>23 A. I'm not certain.</p> <p>24 Q. And at the bottom of that</p>	<p>1 the top.</p> <p>2 A. Yes.</p> <p>3 Q. And the bullet point says,</p> <p>4 "Chronic pain is the number one public</p> <p>5 health problem."</p> <p>6 Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. Do you agree with that?</p> <p>9 A. I don't know if it's the</p> <p>10 number one public health problem. It's</p> <p>11 certainly an important public health</p> <p>12 problem.</p> <p>13 Q. Okay. It says, "The</p> <p>14 priority area of focus. An epidemic of</p> <p>15 pain versus an epidemic of addiction."</p> <p>16 Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. Do you agree that there is</p> <p>19 an epidemic of addiction in the United</p> <p>20 States?</p> <p>21 A. I think there's an epidemic</p> <p>22 of abuse. And I -- there may be people</p> <p>23 who are addicted, I'm not sure. I'd have</p> <p>24 to think a little bit about that.</p>